

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2012

DOCKET No. N2012-1

**RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS MARTIN TO  
FOLLOW-UP INTERROGATORIES OF THE AMERICAN POSTAL WORKERS  
UNION , AFL-CIO (APWU/USPS-T6-21 THROUGH 27)**

The United States Postal Service hereby provides its response to the above-listed follow-up interrogatories of the American Postal Workers Union (APWU), AFL-CIO, dated March 2, 2012. Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

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**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-21.** Please refer to your response to PR/USPS-T6-12(b) where you state:

(b) As information, data from four (4) areas were included in my study, not 16. Only 14 AMP studies had been reviewed by my office at the time I finalized my testimony. I deemed it prudent to include all data points in my study. When all of the AMP studies relevant to this docket have been completed, I will update the record to reflect the additional data.

Now that all of the AMP studies relevant to this docket have been completed, when will you provide the updated record?

**RESPONSE:**

I will update the record with a supplemental response to PR/USPS-T6-12(b) by mid-April 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-22.** Please refer to your response to NPMHU/USPS-T6-5 where you state:

I intend to provide a full and complete response to this interrogatory (NPMHU/USPS-T6-5) within a reasonable period of time after the announcement of those final [AMP] decisions.

Now that all of the AMP studies relevant to this docket have been completed, when will you provide a full and complete response to this NPMHU/USPS-T6-5?

**RESPONSE:**

I will update the record with a supplemental response to NPMHU/USPS-T6-5 by mid-April 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-23.** Please refer to your response to NPMHU/USPS-T6-15 where you state:

I intend to provide a full and complete response to this interrogatory (NPMHU/USPS-T6-15) within a reasonable period of time after the announcement of those final [AMP] decisions.

Now that all of the AMP studies relevant to this docket have been completed, when will you provide a full and complete response to this NPMHU/USPS-T6-15?

**RESPONSE:**

I will update the record with a supplemental response to NPMHU/USPS-T6-15 by mid-April 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-24.** Please refer to your response to NPMHU/USPS-T6-18 where you state:

I intend to provide a full and complete response to this interrogatory (NPMHU/USPS-T6-18) within a reasonable period of time after the announcement of those final [AMP] decisions.

Now that all of the AMP studies relevant to this docket have been completed, when will you provide a full and complete response to this NPMHU/USPS-T6-18?

**RESPONSE:**

I will update the record with a supplemental response to NPMHU/USPS-T6-18 by mid-April 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-25.** Please refer to your response to POIR 4 Question 5(b) where you state in part:

The Postal Service anticipates that all final decisions concerning the AMP reviews associated with this docket will be announced by postal management in mid to late February, 2012. The Postal Service will update the record with information indicating the purpose and utilization of the trip and whether the trip is a candidate for elimination within a reasonable time after those announcements.

Now that all of the AMP studies relevant to this docket have been completed, when will you provide the updated record containing the information requested in POIR 4 Question 5?

**RESPONSE:**

I will update the record with a supplemental response to POIR 4 Question 5(b) by mid-April 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-26.** Please refer to your response to POIR 4 Question 6(b) where you state in part:

For the reasons discussed in my response to Question 5(b) of Presiding Officer's Information Request No. 4 (POIR No. 4), I am unable to provide information on the proposed mileage, proposed trip frequency, and proposed cost of routes in the rationalized network at this time. The Postal Service will update the record with this information within a reasonable time after the final AMP decisions discussed in my response to Question 5(b) are announced.

Now that all of the AMP studies relevant to this docket have been completed, when will you provide the updated record containing the information requested in POIR 4 Question 6?

**RESPONSE:**

I will update the record with a supplemental response to POIR 4 Question 6(b) by mid-April 2012.

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MARTIN  
TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY**

**APWU/USPS-T6-27.** Please refer to your response to POIR 4 Question 8 which states:

Because the design of the rationalized transportation network is not yet complete, I am unable to provide an updated estimate of the percentage reduction in plant-to-plant transportation activity that incorporates the expected increases in trip length from network rationalization at this time. The Postal Service will update the record with this information within a reasonable time after the AMP decisions discussed in my response to Question 5(b) are announced.

Now that all of the AMP studies relevant to this docket have been completed, when will you provide the updated record containing the information requested in POIR 4 Question 8?

**RESPONSE:**

I will update the record with a supplemental response to POIR 4 Question 8 by mid-April 2012.